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12/17/2014

By ECF

The Hon. Magistrate Steven I. Locke
United States District Court
Eastern District of New York
Long Island Federal Courthouse
100 Federal Plaza
Central Islip, NY 11722-9014

RE: Jennifer Rodriguez vs. 21st Century Cosmetic Dental Lung Chao DS,
P.C. Case # 13-CV-06806

Dear Judge Locke:

Both parties have conferred in this matter and have consented to a mutual request to extend the discovery deadlines detailed in the scheduling order of April 24, 2014.

The Original deadlines are as follows:

February 4, 2015 at 11:30 am.: Pretrial conference before the (Magistrate). (Plus additional information contained in the Order.)

January 7, 2015: Completion of all discovery, inclusive of expert discovery. Depositions of experts may be taken at any time prior to trial.

January 21, 2015: Any party planning to make a dispositive motion must take the first action beginning the motion process by this date or risk forfeiting the right to make such a motion. (Plus additional information contained in the Order.)

An extension of the above deadlines is requested as both sides have not yet completed depositions of all parties or non-parties to the action. Parties have participated in the exchange of written discovery thus far, but have not been able to finalize dates for depositions. Furthermore, with the holiday period now upon us we have agreed that it is impossible to achieve this aim by the above deadlines.

All parties have consented to this request for extension.

There have been no prior requests for adjournment or extension of these deadlines.

The proposed amended scheduling order is as follows:

April 8, 2015, or April 15, 2015 at 11:30 am.: Pretrial conference before the (Magistrate). (Plus additional information contained in the Order.)

March 11, 2015: Completion of all discovery, inclusive of expert discovery. Depositions of experts may be taken at any time prior to trial.

March 25, 2015: Any party planning to make a dispositive motion must take the first action beginning the motion process by this date or risk forfeiting the right to make such a motion. (Plus additional information contained in the Order.)

We are thankful for the Court's consideration

Respectfully Submitted,

_____/s/_____
Daniel Grace